

### REMARKS

This paper amends Claim 11 and cancels Claim 18. Claims 1-10, 12-17, 19-23 are unchanged. Claims 1-17 and 19-23 are pending. Reconsideration and allowance of the claims in light of the present remarks is respectfully requested. Claim 18 has been combined into Claim 11.

#### Discussion of Rejection of Claims under 35 U.S.C. § 103(a)

Claims 1-8 and 10-23 have been rejected under 35 U.S.C. § 103(a) as being obvious over Cruz et al. (U.S. Patent No. 5,613,032). The Cruz system describes a system for recording and playing back multiple multimedia events, where each event is assigned to a "track". The preprocessor (300) in Figure 2 and 3A processes the track corresponding to one multimedia event in parallel with the track corresponding to another event. Thus, as shown in Figure 3B, tracks 2 and 3 correspond to separate video camera sources that are processed in parallel throughout the preprocessor (300), as shown in Figure 3A. The compressor (330), shown in Figure 3A, can be arguably considered to be equivalent to an encoder, since the compressor generates compressed data indicative of a recording source, e.g., track 2 has specific compression instruction for the video camera source as shown in the track mapping table of Figure 3B. As described in Cruz, each multimedia source has at most a single compressor operating on the multimedia source track. The synthetic track generator (350) is the only component of the Cruz system that can generate other representations of the multimedia events as derivative tracks or records. Until reaching the synthetic track generator (350), the tracks are referred to by Cruz as "original tracks or records, and which are digitized and time stamped representations of information transmitted from the recording sources" at column 6, lines 59-61. Therefore, the synthetic track generator (350) is the only component of the Cruz system that can arguably correspond to Applicant's claimed feature of a "video cataloger ...generating a plurality of digital metadata tracks indicative of the video information".

#### Claim 1

The architecture of the Cruz system is entirely different than that claimed by Applicant. The two main components recited in Applicant's Claim 1 are a video cataloger and a plurality of

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video encoders. The input for the video cataloger is video information time codes associated with the video information and the input for the plurality of video encoders is the same video information as input to the video cataloger. As recited in part in Claim 1: “the system provides parallel paths of the video information for concurrent receipt and processing by the video cataloger and the video encoders”. The same video information is provided via parallel paths to be concurrently received by the video cataloger and by the video encoders, and then the video cataloger and the video encoders concurrently process the video information. Referring to Applicant’s Figure 1, the source information (102) is provided in parallel to the video cataloger (110) and the encoder process (120) for concurrent receipt and processing by the video cataloger and the encoder process. The encoder output is not the input to the video cataloger, as in the serial path architecture between the compressor (330) and the synthetic track generator (350) for a particular recording source in Cruz. In Cruz, the output of the compressor is the input to the synthetic track generator in a serial path. Further referring to Applicant’s Figure 4, the source information (102) is provided in parallel to the video cataloger (110) and a plurality of video encoders (123, 125, and 127) for concurrent receipt and processing by the video cataloger and the plurality of video encoders. In contrast, Cruz at most has a one to one ratio of recording source to compressor.

The Office Action mailed on June 2, 2005 at page 4 identifies the elements 201-1...201-N in Figure 3A as showing “provides parallel paths of the video information for concurrent receipt and processing by the video cataloger and the video encoders”. However, the recording sources 201-1... 201-N are just a plurality of sources of multimedia information that appear to be operated in a parallel fashion through a series of components that are connected via serial paths.

#### Claims 19 and 22

Similar arguments to the arguments for Claim 1 above apply also to Claims 19 and 22.

#### Claim 11

Amended Claim 11 recites in part “receiving video information at a video cataloger and at a plurality of digital video encoders” and “wherein the generating and the encoding are performed in parallel in a system, and wherein the video information is received concurrently at the video cataloger and at the plurality of digital video encoders”. Similar arguments to the

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arguments for Claim 1 above apply also to Claim 11. Generating digital metadata tracks indicative of the video information at the video cataloger is done in parallel with encoding the video information at each digital video encoder into a type of encoded digital video data, and not via serial operations as performed in the Cruz system. Claim 11 now recites in part that: "the video information is received concurrently at the video cataloger and at the plurality of digital video encoders." In direct contrast, the video information in the Cruz system is first received at the compressor which then provides its output to the synthetic track generator via a serial path.

Furthermore, regarding the Examiner's contention at the bottom of page 4 of the Office Action, Claim 11 (and similarly for Claim 1, 19 and 22) recites in part: "commanding each of the digital video encoders to start encoding" and "storing actual start times associated with the start command for each digital video encoder at the video cataloger". This feature is not shown in Cruz or any other prior art cited by the Examiner.

Because a video information source is associated with a plurality of video encoders and each encoder can have a lag from the receipt of the start command, the actual start time for each encoder is stored. Thus, no matter which encoded video data (from a particular one of the plurality of video encoders) is subsequently used, the encoded video data is synchronized with the video cataloger. This feature can be seen in Applicant's Figure 5 where three encoders for a video information source are shown along with three different actual start times for the encoders. The Cruz system does not describe a start command for an encoder or storing the actual start time for each of a plurality of encoders for a recording source because it has no need to do so.

Applicant respectfully requests allowance of all claims.

#### Dependent Claims

Claims 2-10, 12-17, 20-21 and 23 are dependent either directly or indirectly on one of the above-discussed independent claims. Applicant respectfully submits that pursuant to 35 U.S.C. § 112, ¶4, the dependent claims incorporate by reference all the limitations of the claim to which they refer and include their own patentable features, and are therefore in condition for allowance. Therefore, Applicant respectfully requests the withdrawal of all claim rejections and prompt allowance of the claims.

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Allowed Claim

Claim 9 is objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim.

Conclusion

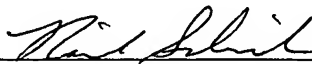
In light of the above, reconsideration and withdrawal of the outstanding rejections are specifically requested. In view of the foregoing remarks, Applicant respectfully submits that the claims of the above-identified application are in condition for allowance. However, if the Examiner finds any impediment to allowing all claims that can be resolved by telephone, the Examiner is respectfully requested to call the undersigned.

Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

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Dated: 9-2-2005

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